

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

CONSUMER FINANCIAL PROTECTION  
BUREAU, *et al.*,

Plaintiffs,

v.

STRATFS, LLC (f/k/a STRATEGIC  
FINANCIAL SOLUTIONS, LLC), *et al.*,

24-CV-40 (EAW) (MJR)

Defendants, and

DANIEL BLUMKIN, *et al.*,

Relief Defendants.

**NOTICE OF DEFENDANT FIDELIS LEGAL SUPPORT  
SERVICES LLC'S MOTION FOR A STAY**

Nature of Action: Enforcement of the Telemarketing and Consumer Fraud and Abuse Prevention Act and the Telemarketing Sales Rule.

Movant: Defendant Fidelis Legal Support Services, LLC.

Date and Time: To be set by the Court. Expedited consideration is requested by separate notice of motion filed today.

Place: Before Hon. Elizabeth A. Wolford, Chief United States District Judge, at the Robert H. Jackson United States Courthouse, 2 Niagara Square, Buffalo, New York 14202, or at the Kenneth B. Keating Federal Building, 100 State Street, Buffalo, New York 14614.

Supporting Papers: Memorandum of law dated March 26, 2025.

Answering Papers: Answering papers shall be filed by April 9, 2025, unless the Court orders otherwise. *See* W.D.N.Y. Local R. Civ. P. 7(b).

Reply Papers: Reply papers shall be filed seven days after answering papers are filed, unless the Court orders otherwise. *See* W.D.N.Y. Local R. Civ. P. 7(b). Fidelis intends to reply.

Relief Requested: An order (i)(a) declaring that Magistrate Judge Michael J. Roemer's ruling entered on March 26, 2025 (and styled as a decision designating Fidelis as a Receivership Defendant within the meaning of the Preliminary Injunction) is a report and recommendation, that does not take effect until reviewed and decided by the District Court following

objections, or (b) staying Judge Roemer's ruling pending decision by the Chief District Judge on Fidelis's objections to the ruling; and (ii) awarding any other or additional relief that the Court deems appropriate.

Grounds for Relief: The Court's inherent authority.

Oral Argument: Requested.

Dated: Buffalo, New York  
March 26, 2025

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